

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SONYA LARSON,

Plaintiff

v.

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants

C.A. No. 1:19-cv-10203-IT

DAWN DORLAND PERRY,

Plaintiff-in-Counterclaim

v.

SONYA LARSON,

Defendant-in-Counterclaim

AFFIDAVIT OF HANNAH Y. AMADEI

I, Hannah Y. Amadei, being of legal age and having been duly sworn, depose and say as follows:

1. I am an attorney with the law firm Partridge Snow & Hahn LLP located at 30 Federal Street, Boston, Massachusetts. My firm represents the Defendant/Plaintiff-in-Counterclaim Dawn Dorland Perry (“Ms. Dorland”) in the above-captioned action.

2. I am admitted to practice in the Commonwealth of Massachusetts and before this Court.

3. The facts provided in this Affidavit are true and correct to the best of my knowledge and if called as a witness, I would and could testify to these facts.

4. Attached as **Exhibit A** is a true and correct copy of a document annotated “FIRST DRAFT UNTITLED” bearing Bates-label LARSON P378-P387. This document was also marked “Exhibit 1” to the July 30, 2021 Sonya Larson Deposition (“Larson Dep. I”).

5. Attached as **Exhibit B** is a true and correct copy of an announcement post dated April 22, 2015 from Ms. Dorland’s private Facebook group, named “DDP LKD (Dawn’s Living Kidney Donation) bearing Bates-label DORLAND00134. This document was also marked “Exhibit 14” to Larson Dep. I.

6. Attached as **Exhibit C** is a true and correct copy of the July 7, 2015 Facebook post by Ms. Dorland to her private Facebook group, wherein she shared the letter she had composed to the final recipient in her kidney donation chain, bearing Bates-label DORLAND00150. This document was also marked “Exhibit 6” to Larson Dep. I.

7. Attached as **Exhibit D** is a true and correct copy of text messages exchanged between Sonya Larson and Sari Boren, dated July 20, 2015, bearing Bates-label LARSONP3000002. This document was also marked “Exhibit 2” to Larson Dep. I.

8. Attached as **Exhibit E** is a true and correct copy of a text message exchange with “Sari” dated July 23, 2015, bearing Bates-label LARSONP3000003.

9. Attached as **Exhibit F** is a true and correct copy of an email exchange between Ms. Dorland and Ms. Larson, sent between July 20, 2015 to July 22, 2015, bearing Bates-label LARSON P36-P38. This document was also marked as “Exhibit 4” to Larson Dep. I.

10. Attached as **Exhibit G** is a true and correct copy of an email exchange between Ms. Larson and Yael Goldstein, sent between November 30, 2015 to December 1, 2015, and attaching a file named “The Kindest, 12.1.15.docx,” bearing Bates-label LARSONP3000942-LARSONP3000964. This document was also marked as “Exhibit 7” to Larson Dep. I.

11. Attached as **Exhibit H** is a true and correct copy of an email from Yael Goldstein to Sonya Larson, and Jennifer Lee, sent December 28, 2015, with the subject line “Audible” bearing Bates-label LARSONP300248.

12. Attached as **Exhibit I** is a true and correct copy of emails between Sonya Larson and certain third-party publishers dated January 18, 2016 and February 29, 2016 bearing Bates-label LARSON P41-LARSONP54.

13. Attached as **Exhibit J** is a true and correct copy of text messages exchanged between Ms. Larson, Sari Boren, and Whitney Scharer, dated January 23, 2016, bearing Bates-label LARSONP3000009. This document was also marked as “Exhibit 3” to Larson Dep. I.

14. Attached as **Exhibit K** is a true and correct copy of an email from Sari Boren to Sonya Larson, sent January 24, 2016, with the subject line “Re: Kidney Story” and bearing Bates-label LARSONP3001252. This document was also marked as “Exhibit 18” to Larson Dep. I.

15. Attached as **Exhibit L** is a true and correct copy of an email exchange between Sonya Larson and Emily Zeller, sent between April 27, 2016 and May 2, 2016, with the subject line “Re: Narration for The Kindest,” attaching a file named “The Kindest, 4.23.16.docx,” and bearing Bates-label LARSONP3001293-LARSONP3001313. This document was also marked as “Exhibit 9” to Larson Dep. I.

16. Attached as **Exhibit M** is a true and correct copy of an email exchange between Sonya Larson and authorcare@audible.com, dated May 4, 2016, with the subject “Adjusted story?” and bearing Bates-label LARSON P74. This document was also marked as “Exhibit 10” to Larson Dep. I.

17. Attached as **Exhibit N** is a true and correct copy of an email exchange between Sonya Larson and Ms. Dorland, sent between June 30, 2016 and August 16, 2016 and bearing Bates-label LARSON P90-LARSON P97. This document was also marked as “Exhibit 11” to Larson Dep. I.

18. Attached as **Exhibit O** is a true and correct copy of an email exchange between Sonya Larson, Jennifer 8. Lee, and Chaz Curet, sent between May 31, 2016 and July 20, 2016, bearing Bates-label LARSON P82-LARSON P85. This document was also marked as “Exhibit 12” to Larson Dep. I.

19. Attached as **Exhibit P** is a true and correct copy of an email exchange between Sonya Larson and others, dated July 18, 2016, with the subject “[Grub Chunky Monkeys] The Chuck T Shirt (aka “Chunk Chic”) and bearing Bates-label LARSON P79-P81.

20. Attached as **Exhibit Q** is a true and correct copy of an email exchange between Sonya Larson and Jennifer 8. Lee, sent between August 4, 2016 and August 9, 2016, with the subject “Re: Your Audiobooks Are Now Available on Audible.com” bearing Bates-label LARSONP3001628-LARSONP3001632.

21. Attached as **Exhibit R** is a true and correct copy of messages between “sonya” and “alison” dated August 15, 2016, bearing Bates-label LARSON P99. This document was also marked as “Exhibit 13” to Larson Dep. I.

22. Attached as **Exhibit S** is a true and correct copy of an email exchange between Sonya Larson, Chaz Curet, and Jennifer Lee, sent October 12, 2016, with subject line “Re: “The Kindest”: Request for Redlines, and attaching a file named “The Kindest, 9.26.16.docx” bearing Bates-label LARSONP3000922-LARSONP3000941. This document was also marked “Exhibit 17” to Larson Dep. I.

23. Attached as **Exhibit T** is a true and correct copy is an email exchange between Sonya Larson and Rebecca Markovits (rebecca.markovits@americanshortfiction.org) sent between June 2, 2017 and June 21, 2017, with the subject “The Kindest” and bearing Bates-label ASF00569-ASF00617.

24. Attached as **Exhibit U** is a true and correct copy of a text message exchange with Sari Boren dated June 16, 2017, bearing Bates-label LARSONP3000029. This document was also marked “Exhibit 19” to Larson Dep. I.

25. Attached as **Exhibit V** is a true and correct copy of a text message exchange with Sari Boren, undated, bearing Bates-label LARSONP3000077.

26. Attached as **Exhibit W** is a true and correct copy of messages between “sonya” and “alison” dated June 16, 2017, bearing Bates-label LARSON P138.

27. Attached as **Exhibit X** is a true and correct copy of an email exchange between Sonya Larson and Rebecca Markovits, sent between May 12, 2018 and May 24, 2018, bearing Bates-label ASF0110-ASF0118.

28. Attached as **Exhibit Y** is a true and correct copy of an email exchange between Dawn Dorland and Samantha Shea, sent between June 3, 2018 and June 4, 2018, with the subject line “Re: Update and a question from Dawn” bearing Bates-label DORLAND00398-DORLAND00402.

29. Attached as **Exhibit Z** is a true and correct copy of an email exchange between Dawn Dorland and Rebecca Markovits of ASF, sent between June 4, 2018 and June 25, 2018, with subject line: “Plagiarism in “The Kindest” and bearing Bates-label ASF0302-ASF0322.

30. Attached as **Exhibit AA** is a true and correct copy of an email exchange between Norah Piehl and Raquel Hitt, sent on June 6, 2018, with the subject line “Re: Dawn Dorland / Sonja Larson” and bearing Bates-label BBF00890-BBF00892.

31. Attached as **Exhibit BB** is a true and correct copy of an email exchange between Dawn Dorland, Norah Piehl and Raquel Hitt, sent between June 7, 2018 and June 18, 2018, with the subject “Re: Plagiarism in “The Kindest” and bearing Bates-label BBF00896-BBF00901.

32. Attached as **Exhibit CC** is a true and correct copy of an email from Dawn Dorland to Breadloaf Writers’ Conference (blwc@middlebury.edu), dated June 7, 2018 with the subject line “Possible plagiarism in Tuition Fellows’ 2017 application” and bearing Bates-label DORLAND000130.

33. Attached as **Exhibit DD** is a true and correct copy of an email exchange between Sonya Larson and Norah Piehl (norah@bostonbookfest.org), sent between June 7, 2018 and June 11, 2018, with the subject “Dawn Dorland” and bearing Bates-label LARSON P174-LARSON P175.

34. Attached as **Exhibit EE** is a true and correct copy of an email from Sonya Larson to Rebecca Markovits dated June 24, 2018 bearing Bates-label ASF0289.

35. Attached as **Exhibit FF** is a true and correct copy of an email to Dawn Dorland with the subject line “Order Confirmation – AudiobookStand” dated July 27, 2018, identifying a purchase of “The Kindest” in “MP3-CD Unabridged” Format, bearing Bates-label DORLAND00125-DORLAND00126.

36. Attached as **Exhibit GG** is a true and correct copy of an email from Deborah Porter of BBF to Sonya Larson and Norah Peihl, dated August 13, 2018, with the subject “One City One Story” and bearing LARSON P266.

37. Attached as **Exhibit HH** is a true and correct copy of an email exchange between Eve Bridburg (eve@grubstreet.org) and Deborah Porter, sent between August 14, 2018 and August 16, 2018, with the subject “Re: Cease and Desist,” forwarding an email Ms. Porter sent to Ms. Larson, bearing Bates-label BBF00006-BBF00007.

38. Attached as **Exhibit II** is a true and correct copy of an email from Dawn Dorland to dearsugars@nytimes.com, sent August 16, 2018 with the subject line: “Boston Book Festival Drops One City One Story selection” and bearing Bates-label DORLAND000411.

39. Attached as **Exhibit JJ** is a true and correct copy of a message from Dawn Dorland to Kat Rosenfield dated December 5, 2018, bearing Bates-label DORLAND000412.

40. Attached as **Exhibit KK** is a true and correct copy of Sonya Larson’s Answers to Interrogatory Nos. 1-19, dated November 25, 2020.

41. Attached as **Exhibit LL** is a true and correct copy of Dawn Dorland’s Response to Interrogatory Nos. 1-25, dated April 2, 2021.

42. Attached as **Exhibit MM** is a true and correct copy of text messages exchanged with Celeste Ng, bearing Bates-label LARSONP3000101-LARSONP3000102.

43. Attached as **Exhibit NN** is a true and correct copy of a file produced by Sonya Larson in Microsoft Word format, with the file name “The Kindest, for the Boston Book Festival.docx.” The metadata for this document provides that this version was “Last Modified” on July 1, 2018 by Sonya Larson.

44. Attached as **Exhibit OO** are true and correct copies of emails Ms. Dorland received from the United States Copyright Office, confirming receipt of the Deposit and application for registration for the work “Dorland kidney chain final recipient letter July 2, 2015” bearing Bates-label DORLAND00001-DORLAND00003.

45. Attached as **Exhibit PP** is a true and correct copy of select excerpts from the transcript of the September 3, 2021 Deposition of Dawn Dorland Perry.

46. Attached as **Exhibit QQ** is a true and correct copy of select excerpts from the transcript of the September 22, 2021 Deposition of Dawn Dorland Perry.

47. Attached as **Exhibit RR** is a true and correct copy of select excerpts from the transcript of the July 31, 2021 Deposition of Sonya C. Larson.

48. Attached as **Exhibit SS** is a true and correct copy of select excerpts from the transcript of the September 28, 2022 Deposition of Sonya C. Larson.

49. Attached as **Exhibit TT** is a true and correct copy of an excerpt from Ex. A to Sonya Larson’s Motion to Dismiss, Doc. No. 78-1, *The Kindest* Brilliance Version.

50. Attached as **Exhibit UU** are true and correct copies of certain correspondence between Sonya Larson and other individuals, bearing Bates-labels LARSONP3000001; LARSONP3000006; LARSONP3000007; LARSONP3000008; LARSONP3000011; LARSONP3000013; LARSONP3000014; LARSONP3000017; LARSONP3000026; LARSON P75; LARSON P115; LARSON P99; LARSON P137.

51. Attached as **Exhibit VV** is a true and correct copy of a visual aid and analysis prepared by my office comparing the Dorland Letter and the letter in the Brilliance version of *The Kindest*.

52. Attached as **Exhibit WW** is a true and correct copy of a visual aid and analysis prepared by my office comparing the Dorland Letter and the letter in the ASF version of *The Kindest*.

53. Attached as **Exhibit XX** is a true and correct copy of a visual aid and analysis prepared by my office comparing the Dorland Letter and the letter in the registered version of *The Kindest*.

54. Attached as **Exhibit YY** is a true and correct copy of the front cover and publication notice of the print edition of American Short Fiction, Emerging Writers Issue, published in 2017.

55. Attached as **Exhibit ZZ** is a true and correct copy of an email from Sonya Larson to Norah Piehl, dated July 26, 2018, forwarding an email Sonya Larson sent to Graham Ambrose (graham.ambrose@globe.com), bearing Bates-label LARSON P218-P219.

SIGNED under the penalties of perjury this 28th day of October, 2022.

/s/Hannah Y. Amadei
Hannah Y. Amadei (BBO #710509)

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of October 2022, this document was filed and served through the ECF system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Hannah Y. Amadei
Hannah Y. Amadei (BBO #710509)